

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION**

BRANDON MENG

PLAINTIFF

V.

NO.: 2:24-cv-199-KS-MTP

WILLIAM CAREY UNIVERSITY,
acting through its Division of the College of
Osteopathic Medicine,
ITALO R. SUBBARAO, D.O., and
EDWARD FRIEDLANDER, M.D.

DEFENDANTS

DEFENDANT FRIEDLANDERS' MOTION TO DISMISS

Defendant Edward Friedlander, M.D. (“Defendant” or “Friedlander”), reserving all rights and defenses, asks this Court to dismiss Meng’s Complaint [Doc. 1] pursuant to Federal Rules of Civil Procedure 12(b)(6). In support, Defendant states as follows:

1. Plaintiff has failed to state a claim for race discrimination under Section 1981.
2. Dr. Friedlander did not interfere with any contract between Plaintiff and William Carey University.

In support of his Motion, Defendant relies on the pleadings and papers of record in this action, his Memorandum Brief submitted contemporaneously herewith, and following exhibits:

Exhibit “A” Email thread between Meng and Friedlander; and

Exhibit “B” Warning for Unprofessional Behavior.

FOR THESE REASONS, Defendant Edward Friedlander respectfully moves this Court to dismiss Plaintiff’s claims against Defendant Friedlander in its entirety. Defendant Friedlander requests such other relief as the Court deems appropriate under the circumstances.

THIS, the 12th day of March 2025.

Respectfully submitted,

EDWARD FRIEDLANDER, M.D.

/s/ Paul B. Watkins, Jr.

PAUL B. WATKINS, JR. (MB NO. 102348)

J. ANDREW MAULDIN (MB NO. 104227)

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